

LATHAM & WATKINS LLP
Daniel P. Brunton (Bar No. 218615)
Email: daniel.brunton@lw.com
12670 High Bluff Drive
San Diego, CA 92130
Tel.: (858) 523-5400
Fax: (858) 523-5450

Michael G. Romey (Bar No. 137993)
Email: michael.romey@lw.com
355 South Grand Avenue, Suite 100
Los Angeles, CA 90071-1560
Tel.: (213) 485-1234
Fax: (213) 891-8763

Janice M. Schneider (*Pro Hac Vice*)
Email: janice.schneider@lw.com
Devin M. O'Connor (*Pro Hac Vice*)
Email: devin.o'connor@lw.com
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004-1304
Tel.: (202) 637-2200
Fax: (202) 637-2201

*Attorneys for Intervenor-Defendant
Sable Offshore Corp.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs,

v.

DOUG BURGUM, et al.,

Defendants,

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

CASE NO.. 2:24-cv-05459-MWC-MAA

**DECLARATION OF DANIEL P.
BRUNTON IN SUPPORT OF SABLE
OFFSHORE CORP.'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT AND
CROSS-MOTION FOR SUMMARY
JUDGMENT**

Hearing

Date: July 11, 2025

Time: 1:30 PM

Judge: Hon. Michelle Williams Court

Courtroom: 6A

Pursuant to 28 U.S.C. § 1746(2), I, Daniel P. Brunton, hereby declare:

1. I am an attorney licensed to practice law in the State of California, a member of this court, and am Counsel at Latham & Watkins LLP, counsel of record for Intervenor-Defendant Sable Offshore Corp. (“Sable”) in the above captioned action. I have personal knowledge of the matters recited herein, and if called upon to testify concerning them under oath, I could and would testify thereto.

2. A true and correct copy of the Environmental Assessment (“EA”) issued by the Bureau of Ocean Energy Management and relied upon by the Bureau of Safety and Environmental Enforcement (“BSEE”), and the Finding of No Significant Impact (“FONSI”) issued by BSEE regarding Sable’s Lease Extension for the Santa Ynez Unit, dated May 28, 2025, is attached hereto as **Exhibit A**.¹

3. A true and correct copy of BSEE’s superseding decision regarding Exxon Mobil Corporation’s October 19, 2023, request for additional time to resume operations for the Santa Ynez Unit with accompanying Memorandum for the Regional Supervisor, dated May 29, 2025, is attached hereto as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on May 30, 2025.



Daniel P. Brunton

¹ The EA and FONSI are available on the agency’s website:
https://www.boem.gov/sites/default/files/documents/environment/environmental-assessment/2025_0523_SableEA%202025May28.pdf.